

## **REMARKS**

The Office Action of February 2, 2010 has been carefully reviewed. Applicants respectfully request the Examiner to reconsider the rejections and allow the pending claims in view of the following remarks.

### **I. Claim Status**

Claims 1-21 are pending. Claims 12-18 are canceled without prejudice or disclaimer. Claims 22 through 28 are new. Support for the new amended claims may be found in the as-filed specification at pages 9, 11, and 27, as well as Figure 2 and Figure 3. No new matter is added.

For the Examiner's convenience, Applicants have presented the above claims in clean form at the end of this paper. The clean set of claims should not be considered additional claim amendments or arguments; the clean set of claims is presented for ease of reference only.

### **II. Response to Rejection**

The Office Action rejected claims 1-21 as obvious under 35 U.S.C. § 103(a) in view of Audebert (U.S. Patent Application Publication 2003/0005317), Paatero (U.S. Patent Application Publication 2003/0163685), and Tabbara (U.S. Patent 6,886,038). This rejection is respectfully traversed.

Applicants respectfully submit that the cited references, considered as a whole, cannot reasonably be interpreted as disclosing all of the elements of the amended claims

or give rise to the legal conclusion that the claims are obvious. Nevertheless, Applicants briefly address the combination of the cited references.

The Office Action asserts that Audebert discloses a plurality of domains on a wireless mobile communication device and at least one domain including a plurality of different assets. Office Action, p.4. The Office Action asserts that Paatero discloses the different assets within a domain requiring a common level of trust to access and a domain controller for controlling access to the different assets that require a common level of trust to access within a domain configured to receive a request to perform an operation affecting at least one of the assets. Office Action, p.5. The Office Action asserts that Tabbara discloses a domain controller configured to control the plurality of domains. Office Action p. 6. The Office Action further asserts that the combination of these features would render claim 1 obvious. Id.

Applicants respectfully submit that the combination of cited references, considered as a whole, does not disclose the features of claim 1 either as previously presented or as currently amended. For example, Tabbara does not disclose a domain controller configured to control a plurality of domains on a wireless communication device because Tabbara is directed towards controlling different nodes in an entire network of devices, not domains on an individual device. For example, those of ordinary skill would not think to modify techniques applying to multiple devices to those applying to a single device. Further, the Office Action agrees that Audebert and Paatero do not disclose this feature. Given that Tabbara does not disclose this feature, the proposed combination of references, considered as a whole, does not disclose all of the features of claim 1 as previously presented or currently amended.

Additionally, Paatero does not disclose domains or their use. Applicants respectfully submit that the memory 16 and tamper resistant memory 16', cited by the Office Action, cannot reasonably be considered "domains" in the manner previously or currently claimed. Additionally, no "common level of trust" is present in Paatero because only a single key is used to access the secured data. The Office Action agrees that Audebert does not disclose this feature. Tabbara does not disclose this feature because Tabbara is directed towards managing multiple devices, not managing domains within a single device. Thus, again, the proposed combination of references, considered as a whole, does not disclose all of the features of claim 1.

Additionally, the amended claims contain features not shown in the combination of references, such as for example "wherein the domain controller is further configured to receive a request to perform an operation affecting a particular asset in the first set of assets and to determine whether the request originated from a first entity that has a first trust relationship with the first domain," in conjunction with "wherein the domain controller is further configured to permit completion of the operation affecting the particular asset only if the request originated from the first entity, and wherein the domain controller is further configured to permit the first entity to perform operations with respect to each of the first set of assets," as in claim 1. Independent claims 11 and 26 contain features similar to those presented in amended claim 1. The remaining dependent claims 2-10, 19-25, 27, and 28 contain these features by virtue of their dependence from corresponding independent claims 1, 11, and 26. Therefore, all of the claims should be allowable over the art of record considered together or alone.

**CONCLUSION**

The Applicants respectfully submit that the Application, in its present form, is in condition for allowance. If the Examiner has any questions or comments or otherwise feels it would be helpful in expediting the application, the Examiner is encouraged to telephone the undersigned at (972) 731-2288. The Applicants intend this communication to be a complete response to the Office Action mailed February 2, 2010.

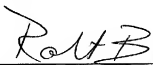
The Commissioner is hereby authorized to charge payment of any fee associated with any of the foregoing papers submitted herewith or any fees during the prosecution of the present case to Deposit Account No. 50-1515, Conley Rose, P.C.

Respectfully submitted,

CONLEY ROSE, P.C.

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5601 Granite Parkway, Suite 750  
Plano, Texas 75024  
Telephone: (972) 731-2288  
Facsimile: (972) 731-2289

  
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J. Robert Brown, Jr.  
Reg. No. 45,438

ATTORNEY FOR APPLICANTS